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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:	)	
	)	Chapter 11
	)	
NORDIC AVIATION CAPITAL DESIGNATED	)	Case No. 21-33693 (KRH)
ACTIVITY COMPANY, <i>et al.</i> , <sup>1</sup>	)	
	)	
Debtors.	)	(Joint Administration Requested)
	)	

**SECOND AMENDED FIRST DAY AGENDA FOR HEARING ON  
DECEMBER 21, 2021, AT 9:00 A.M. (PREVAILING EASTERN TIME)**

**PLEASE TAKE NOTICE** that the following matters are scheduled for hearing by remote video conference on December 21, 2021 at 9:00 a.m. (prevailing Eastern Time). Interested parties who wish to participate by video or audio may do so by registering in advance at:

<https://www.zoomgov.com/meeting/register/vJItcuytqzopGgMutCBACQQK3wK5bcKa-Jc>

<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://dm.epiq11.com/nac>. The location of the Debtors' service address for the purposes of these chapter 11 cases is: 550 Andrews Avenue, Suite 300, Fort Lauderdale, Florida 33301.

**PLEASE TAKE FURTHER NOTICE** that for parties who wish to attend the hearing, but do not intend on participating in the hearing (listen-only), advance registration is not required and such parties may attend the hearing by using the following dial-in numbers:

Line 1

Phone Number: 1-866-590-5055  
Access Code: 4377075  
Security Code: 122121

Line 2

Phone Number: 1-888-363-4734  
Access Code: 3238664  
Security Code: 122121

**I. INTRODUCTION**

1. “Joint Administration Motion” Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3].
2. “First Day Bickle Declaration” Declaration of Justin Bickle, Chief Executive Officer of Nordic Aviation Capital A/S and Chairman of the Restructuring Committee, in Support of the Debtors’ Chapter 11 Petitions and Restructuring Transactions [Docket No. 6].
3. “First Day Richards Declaration” Declaration of Briana Richards in Support of the Debtors’ Chapter 11 Petitions and First Day Motions [Docket No. 15].

**II. MOTION TO EXPEDITE**

4. “Motion to Expedite First Day Hearing and Approve Form of Commencement” Debtors’ Motion for Entry of an Order (I) Setting an Expedited Hearing on “First Day Motions,” (II) Approving the Form of Commencement, and (III) Granting Related Relief [Docket No. 4].

**III. OPERATIONAL MOTIONS**

5. “Cash Management Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Maintain Existing Business Forms and Books and Records, and (C) Perform Intercompany Transactions and Grant Administrative Expense Status to Intercompany Transactions and (II) Granting Related Relief [Docket No. 16].
  - a. Notice of Filing of Revised Proposed Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Maintain Existing Business Forms and Books and Records, and (C) Perform Intercompany Transactions and Grant Administrative Expense Status to Intercompany Transactions and (II) Granting Related Relief [Docket No. 54].

6. *“Vendors Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Foreign Claimants, and (B) Lien Claimants, (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders, and (III) Granting Related Relief [Docket No. 10].*
7. *“Wages Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Compensation, and Benefit Obligations and (B) Continue Employee Compensation and Benefits Programs, and (II) Granting Related Relief [Docket No. 9].*
8. *[Withdrawn] “Motion to Seal” Debtors’ Motion for Entry of an Order Authorizing the Debtors to File Exhibits Under Seal in Connection With the Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue to Honor Customer Deposits, Reimbursements, and Other Customer Related Obligations in the Ordinary Course of Business, and (II) Granting Related Relief [Docket No. 14].*
9. *“Customer Programs Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue to Honor Customer Deposits, Reimbursements, and Other Customer Related Obligations in the Ordinary Course of Business, and (II) Granting Related Relief [Docket Nos. 12 and 13].*
  - a. *Notice of Filing of Amended Exhibits to Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue to Honor Customer Deposits, Reimbursements, and Other Customer Related Obligations in the Ordinary Course of Business, and (II) Granting Related Relief [Docket No. 55].*
10. *“Insurance Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Their Prepetition Insurance Coverage and Satisfy Prepetition Obligations Related Thereto, (B) Continue to Pay Certain Brokerage Fees, and (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (II) Granting Related Relief [Docket No. 7].*
11. *“Taxes Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. 8].*

#### **IV. ADMINISTRATIVE MOTIONS**

12. *“Claims and Noticing Agent Retention Application” Debtors’ Application for Entry of an Order (I) Approving the Retention and Appointment of Epiq Corporate Restructuring, LLC as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief [Docket No. 5]*

- a. *Declaration of Kate Mailloux in Support of the Debtors' Application for Entry of an Order (I) Approving the Retention and Appointment of Epiq Corporate Restructuring, LLC as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief* [Docket No. 5, Exhibit C].
13. *"SOFA, Schedules, and Creditor Matrix Motion" Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules and Statements of Financial Affairs and Rule 2015.3 Reports, (II) Authorizing the Debtors to File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (III) Authorizing the Debtors to File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (IV) Authorizing the Debtors to Redact Certain Personal Identification Information, and (V) Granting Related Relief* [Docket No. 11].

*[Remainder of page intentionally left blank]*

Richmond, Virginia  
Dated: December 20, 2021

*/s/ Jeremy S. Williams*

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